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LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

September 1, 2021

The application is GRANTED. The initial pre-trial conference scheduled for September 9, 2021, at 11:00 a.m., is **adjourned to September 30, 2021, at 11:00 a.m.**, on the following conference call line: 888-363-4749, access code: 558-3333. The parties are reminded that their joint letter and proposed case management plan are due seven days prior, or by **September 23, 2021**.

SO ORDERED.

Dated: September 2, 2021
New York, New York

Via ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshal United States Courthouse
40 Foley Square
New York, New York 10007

Re: Travelers Property Casualty Company of America v. Zurich American Insurance Company, Case No. 1:21-cv-05319-LGS

Dear Judge Schofield:

This firm represents the plaintiff, Travelers Property Casualty Company of America ("Travelers"), in the above referenced matter. I write to request an adjournment of the Initial Pretrial Conference in this matter, currently scheduled for September 9, 2021, until September 30, 2021, or to such other date thereafter as is convenient for the Court, with the joint letter and proposed case management plan and scheduling order (currently due to be submitted on September 2, 2021) to be submitted one week before the adjourned Initial Status Conference date. The Initial Status Conference was originally scheduled for August 26, 2021, but was adjourned to the current date of September 9, 2021, after I requested an adjournment from this Court.

The reason for this request is that Defendant Zurich American Insurance Company ("Zurich") has not yet answered or otherwise appeared in this matter. I have had several discussions with counsel on behalf of Zurich and understand that counsel is working through potential conflict issues and, assuming those issues are resolved, will be appearing on behalf of Zurich. Travelers believes it will not be practicable to produce a joint letter and proposed case management plan and scheduling order, and to have a productive Initial Status Conference, before Zurich has finalized representation and its litigation counsel has reviewed the matter. Accordingly, Travelers is seeking an adjournment of the Initial Status Conference and associated filing deadline so that Zurich may finalize representation and the parties' counsel discuss and submit the required joint filings in an orderly fashion.

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Travelers has made one previous request for the relief requested in this letter. Travelers makes this request with the consent of counsel who contacted me on behalf of Zurich.

Very truly yours,

/s/ Amy C. Gross

Amy C. Gross

cc: Adam Smith, Coughlin, Midlige & Garland LLP (via email)
William T. Corbett, Jr., Coughlin, Midlige & Garland LLP (via email)

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